

The Honorable Robert J. Bryan

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff
v.
JAMES DOMINIQUE MAYFIELD
Defendant.

NO. CR92-1781 RJB

UNITED STATES' MOTION TO FILE A
BRIEF IN EXCESS OF TWELVE PAGES

NOTED: Friday, March 19, 2021

The United States of America, by Tessa M. Gorman, Acting United States Attorney for the Western District of Washington and Helen J. Brunner, Assistant United States Attorney for said District, hereby seeks an order from this Court permitting the United States to file a Response to Motion for Reduction in Sentence Pursuant to 18 U.S.C. § 3582(c)(1)(A) in excess of the twelve-page limitation prescribed in CrR 12(c)(6) of the Local Rules of the United States District Court for the Western District of Washington. Specifically, the United States seeks the Court's approval to file a Response that is up to 13 pages in length.

11

11

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The United States seeks this authorization to file an over-length brief because it seeks to thoroughly address the issues and arguments raised in the defendant's motion, notably, the manner in which the Bureau of Prisons is handling the current coronavirus disease 2019 (COVID-19) pandemic and the risk, if any, defendant faces incarcerated in a BOP facility. It is also necessary to inform the Court as to the procedural requirements that a defendant must seek to have a request for compassionate released entertained by this Court – requirements which the defendant has failed to satisfy.

For these reasons, the United States respectfully requests this Court to grant this motion to file an over-length brief.

DATED this 5th day of March, 2021.

Respectfully submitted,

TESSA M. GORMAN
Acting United States Attorney

s/ Helen J. Brunner
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